

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PAVLE ZIVKOVIC, on behalf of himself and others  
similarly situated,

Plaintiff,

v.

LAURA CHRISTY LLC d/b/a VALBELLA,  
LAURA CHRISTY MIDTOWN LLC, DAVID  
GHATANFARD, and GENCO LUCA,

Defendants.

No. 17-cv-00553-GHW

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and annexed materials, Plaintiffs shall move the Court at such date and time as counsel may be heard to grant Plaintiffs' *ex parte* motion for a temporary restraining order pursuant to Fed. R. Civ. P. 69 and C.P.L.R. § 6210 against non-party Rosey Kalayjian.

On this date, the undersigned contacted chambers for the Court, informed chambers of Plaintiffs' intent to file this motion and Plaintiff's accompanying motion for an order of attachment on an *ex parte* basis, and was instructed to file this motion via ECF. Plaintiffs respectfully request permission to file this motion and Plaintiffs' accompanying motion for an order of attachment on an *ex parte* basis for the reasons set forth in the accompanying memorandum of law.

Dated: New York, New York  
June 29, 2023

Respectfully submitted,

**JOSEPH & KIRSCHENBAUM LLP**

/s/ Lucas C. Buzzard

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